

Davis, Clay R -FS

From: Dick Artley <da99333@gmail.com>
Sent: Tuesday, September 06, 2016 8:10 AM
To: Vermillion, Jason -FS; Davis, Clay R -FS; Moore, Jonathan M -FS; Gould, Randy -FS
Subject: [CAUTION: Suspicious Link]Challenge Community Protection and Fuels Reduction project scoping comments

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September 6, 2016

Dear Ranger Gould,

My scoping comments on the proposed Challenge Community Protection and Fuels Reduction (CPFR) timber sale are shown below.

I appreciate the fact that you are taking action to save lives and structures in Woodleaf and Challenge should there be a fire in the area.

I don't approve of your choice to hide and ignore the most effective wildfire damage reduction methods in use today developed by a USFS employee. Most Americans find it strange that an agency would not adopt the research conclusions of one of its employees. I know why. He shows fine fuels removal close to homes at risk is much more effective at reducing fire damage than commercial logging of merchantable trees (a.k.a. hazardous fuels reduction).

Dr. Jack Cohen was brave enough to put public safety ahead of agency loyalty as he did his research. He was ostracized by the USFS because he told the truth. His research shows hazardous fuels reduction is ineffective at fire damage risk reduction. See below:

A small sample of Dr. Cohen's research conclusions and opinions of other reputable sources (including the GAO) on this subject is included below:

"As stated, the evidence indicates that home ignitions depend on the home materials and design and only those flammables within a few tens of meters of the home (home ignitability). The wildland fuel characteristics beyond the home site have little if any significance to WUI home fire losses." (Pg. 5)

Source: Cohen, Jack, Transcript of Reducing the Wildland Fire Threat to Homes: Where and How Much? Presented as the Fire Economics Symposium in San Diego, California on April 12, 1999.

Link to source document: http://www.fs.fed.us/rm/pubs_other/rmrs_1999_cohen_j001.pdf

"Vegetation management beyond the structure's immediate vicinity has little effect on structure ignitions. That is, vegetation management adjacent to the structure would prevent ignitions from flame exposure; but vegetation management away from the structure would not affect ignition from flame exposure and would not significantly reduce ignitions from firebrands." (Pg. 4)

Source: Cohen, Jack "Objectives and considerations for wildland fuel treatment in forested ecosystems of the interior western United States"

Published in *Forest Ecology and Management* 256, 2008

Link to source document: <http://www.firewise.org/Information/Research-and-Guidance/WUI-Home-Ignition-Research/~media/Firewise/Files/Pdfs/Research/CohenFuelTreatment.pdf>

"Effective landscape fuel reduction does not necessarily prevent W-UI home fire destruction." (Pg. 10)

Source: Cohen, Jack, "Objectives and considerations for wildland fuel treatment in forested ecosystems of the interior western United States"

Published in *Forest Ecology and Management* 256, 2008

<http://www.firewise.org/Information/Research-and-Guidance/WUI-Home-Ignition-Research/~media/Firewise/Files/Pdfs/Research/CohenFuelTreatment.pdf>

"Most of the trees that need to be removed to reduce accumulated fuels are small in diameter and have little or no commercial value."

"Mechanically removing fuels (through commercial timber harvesting and other means) can also have adverse effects on wildlife habitat and water quality in many areas. Officials told GAO that, because of these effects, a large-scale expansion of commercial timber harvesting alone for removing materials would not be feasible. However, because the Forest Service relies on the timber program for funding many of its activities, including reducing fuels, it has often used this program to address the wildfire problem. The difficulty with such an approach, however, is that the lands with commercially valuable timber are often not those with the greatest wildfire hazards."

Source: Government Accounting Office, "Western National Forests: A Cohesive Strategy is Needed to Address Catastrophic Wildfire Threats"

GAO/RCED-99-65

Link to source document: <http://www.gao.gov/archive/1999/rc99065.pdf>

"The Congressional Research Service (CRS) recently addressed the effect of logging on wildfires in an August 2000 report and found that the current wave of forest fires is not related to a decline in timber harvest on Federal lands. From a quantitative perspective, the CRS study indicates a very weak relationship between acres logged and the extent and severity of forest fires. To the contrary, in the most recent period (1980 through 1999) the data indicate that fewer acres burned in areas where logging activity was limited."

"Qualitative analysis by CRS supports the same conclusion. The CRS stated: "[T]imber harvesting removes the relatively large diameter wood that can be converted into wood products, but leaves behind the small material, especially twigs and needles. The concentration of these fine fuels on the forest floor increases the rate of spread of wildfires."

Similarly, the National Research Council found that "logging and clearcutting can cause rapid regeneration of shrubs and trees that can create highly flammable fuel conditions within a few years of cutting."

Source: Lavery, Lyle, USDA Forest Service and Tim Hartzell U.S. Department of the Interior "A Report to the President in Response to the Wildfires of 2000", September 8, 2000.

Link to source document: <http://www.fs.fed.us/emc/hfi/president.pdf>

Here is a quote from the 1996 "**Sierra Nevada Ecosystem Project: Final Report to Congress**. Please consider this information as you formulate the final Proposed Action.

"Timber harvest, through its effects on forest structure, local microclimate, and fuels accumulation, has increased fire severity more than any other recent human activity."(pg.62)

"Logged areas generally showed a strong association with increased rate of spread and flame length, thereby suggesting that tree harvesting could affect the potential fire behavior within landscapes. In general, rate of spread and flame length were positively correlated with the proportion of area logged in the sample watersheds."

"As a by-product of clearcutting, thinning, and other tree-removal activities, activity fuels create both short- and long-term fire hazards to ecosystems. The potential rate of spread and intensity of fires associated with recently cut logging residues is high."

Source for quote above: University of California; SNEP Science Team and Special Consultants
"**Sierra Nevada Ecosystem Project: Final Report to Congress**
Volume 1, Chapter 4 – Fire and Fuels.
http://ceres.ca.gov/snep/pubs/web/PDF/v1_ch04.pdf

There are many more. They are available if you request them. This should be enough.

The National Fire Protection Association (NFPA) developed the Firewise program used nationwide which applies Dr. Cohen's fine fuels removal methods.

As is the case here, most USFS scoping packages and NEPA documents dealing with WUI protection don't mention Dr. Cohen or Firewise. Why? The USFS doesn't want the public asking questions after they have read Dr. Cohen's research conclusions.

When the public living in the WUI finds out the USFS has consciously excluded the application of Firewise methods application they will loose trust and as part of their Proposed Action

Here's the Firewise website for those who might be receiving copies of these comments:
<http://firewise.org/?sso=0>

Ranger Gould, I suggest the Proposed Action you present in the draft NEPA document include Firewise application. This would include Firewise workshops, Firewise written material distribution to people living in the WUI, and most importantly your Proposed Action would offer implementation assistance to help the elderly and disabled on their property with written permission.

If you apply herbicides that contain glyphosate (Roundup etc.) you will wake up each morning wondering how many people will die of cancer and how many kids will struggle through life coping with birth defects and autism because you didn't care.

You say you will "remove" non-native invasive plants but you don't say how this will be done. Here's your statement:

"Known and encountered non-native invasive plants – weeds – would be removed; all project activities would be done in accordance with best management practices for controlling invasive plants." (pg 3)

Please do not use herbicides that contain glyphosate (Roundup).

Multiple scientific studies carried out by independent scientists not affiliated with the USFS conclude even casual exposure to glyphosate causes terrible, health problems in mammals (**including humans**). The worst? Glyphosate exposure causes cancer (non-Hodgkin's lymphoma and hairy cell leukemia) later in life. Here are the rest:

birth Defects,
miscarriages,
DNA Damage,
cell death,
autism,
irreparable kidney and liver damage.
obesity,
diabetes,
heart disease,
depression,
infertility,
learning disabilities,
attention deficit hyperactive disorder (ADHD),
dementia,
mitochondrial damage,
cell asphyxia,
endocrine disruption
alzheimer's disease,
schizophrenia and bipolar disorder,
skin tumors,
premature births,
thyroid damage,
Parkinson disease,
death of liver cells,
severe reproductive system disruptions, and
chromosomal damage.

Here's a small sample of information the USFS does not touch:

FDA to Start Testing Monsanto's Glyphosate in Food, February 19, 2016

Link: <http://readersupportednews.org/news-section2/318-66/35283-fda-to-start-testing-monsantos-glyphosate-in-food>

A 'Lively' Day at Monsanto Headquarters

Link: <https://www.organicconsumers.org/blog/%E2%80%98lively%E2%80%99-day-monsanto-headquarters>

The Plot Twists Continue in the Saga of a Controversial Weed Killer

Monsanto purchases experts to say the right thing. Read about it here:

<http://www.takepart.com/article/2016/05/19/glyphosate-controversy?cmpid=tpdaily-eml-2016-05-20-A>

In Defiance of Sanity, USDA Approves Dow's Agent Orange GMO

Link: <http://www.sustainablebusiness.com/index.cfm/go/news.display/id/25907>

Is the USDA Covering Up Potential Dangers That Affect Your Health?

Link: <http://www.liveinthenow.com/article/is-the-usda-covering-up-dangers-that-affect-your-health>

USDA and Monsanto "Biotech" Industry Collusion

Link: <http://www.truthwiki.org/usda-and-monsanto-biotech-industry-collusion/>

Corruption at the USDA

Link: <https://newhomeeconomics.wordpress.com/2010/03/09/corruption-at-the-usda/>

MONSANTO'S ROUNDUP KILLS AND DAMAGES MORE THAN WEEDS

Link: <http://www.truth-out.org/speakout/item/34689-monsanto-s-roundup-kills-and-damages-more-than-weeds>

Herbicides that contain glyphosate are banned in Denmark, England, Italy, El Salvador, Sri Lanka, France, Holland, Austria, Bulgaria, Germany, Greece, Hungary, Ireland, Japan, Chile, South Africa, Luxembourg, Madeira, New Zealand, Peru, South Australia, Russia, France, Switzerland, Columbia, and Costa Rica

Please consider the links displayed in this WEB search

<http://www.bing.com/search?q=Roundup+Banned+in+What+Countries&first=1&FORM=PERE>

In September of 2015 the California Environmental Protection Agency announced its intention to label glyphosate as carcinogenic

These links provide more information:

<http://guardianlv.com/2015/09/california-epa-to-label-glyphosate-as-carcinogenic/>

<http://www.fooddiver.com/news/california-epa-pushing-to-label-glyphosate-as-carcinogenic/405238/>

You propose to construct an undisclosed amount of temporary road.

Comment: A report authored by Gerald Coghlan, WO Acting Director of Engineering in 1998 (17 years ago) indicated there are 372,956 miles of national forest system road (page 5). The agency currently constructs 2,170 miles of system road per year. At this rate there are 410,000 miles now. In addition to that, there is at least double this amount in unsurfaced, sediment producing, outsloped, temporary roads. The average distance to the moon (it varies) is 384, 403 miles ... and you propose more? Go figure!

See: http://www.fs.fed.us/eng/road_mgt/roadsummary.pdf

Please consider the following articles. Assure the source documents for the articles are included in the References section and cited in the draft NEPA document. This represents "best-science."

Article Name: "Road Woes for the Forest Service", March 2002

Short excerpt of article: "Since 1975, the construction of timber roads has cost taxpayers in excess of \$5 billion. In addition, the Forest Service gives trees free of charge to logging companies in exchange for building access roads. This system has resulted in enough roads in the national forests to circle the globe more than 17 times, or to travel to the moon and back."

Link to total article online: <http://www.taxpayer.net/library/weekly-wastebasket/article/road-woes-at-the-forest-service>

Article Name: "The United States Forest Service: the World's Largest Socialized Road-Building Company", May 1993

Short excerpt of article: "As implausible as this may seem, the numbers do not lie. So far, the Forest Service has constructed 343,000 miles of road on our national forests. This alone is eight times the entire mileage of the United States Interstate Highway System. Think about that the next time you're driving cross-country on I-80, or heading for Florida on I-95."

Link to total article online: <http://fff.org/explore-freedom/article/united-states-forest-service-worlds-largest-socialized-roadbuilding-company/>

Article Name: "Think Like a River: the Cumulative Effects of Roads on Aquatic Systems", November 1998

Short excerpt of article: "In addition to the site-specific effects of roads on aquatic systems (for reviews see RIPorters 1:1 and 2:5), one of the least-known and most compelling examples of the cumulative impacts of a road network is found within Montana's Bitterroot National Forest. In 1991 and 1992, U.S. Forest Service researchers examined watersheds within west-draining slopes of the Sapphire Range and found a highly significant correlation between low road densities and healthy watersheds. Additionally, bull trout (*Salvelinus confluentus*) populations were directly associated with low road density watersheds (BNF 1991, 1992). Subsequent research supported these findings by attributing the decline of fish presence (Eaglin and Hubert 1993) and aquatic biointegrity (Roth et al. 1996; Rothrock et al. 1998) to increasing road densities. Even the aquatic assessment for the Interior Columbia Basin Ecosystem Management Project (ICBEMP), concluded that "...increasing road density is correlated with declining aquatic habitat conditions and aquatic integrity" (Lee et al. 1997, p. 1347). The implication is that not only do roads impact local areas, but their cumulative effects can fundamentally alter landscape processes (e.g. seasonal migrations of anadromous fish) which result in a series of cascading ecological effects."

Link to total article online: <http://www.wildlandsepr.org/road-reporter/think-river-cumulative-effects-roads-aquatic-systems>

Finally, here's a quote of Chief Dombeck's statement to USFS employees. Please include it in the draft NEPA document.

"Roads often cause serious ecological impacts. There are few more irreparable marks we can leave on the land than to build a road."

Dr. Mike Dombeck, Chief, US Forest Service
Remarks to Forest Service employees
and retirees at the University of Montana
February 1998

Here's a related story. Is your proposal consistent with this?

"Michael Dombeck, the chief of the United States Forest Service, will soon announce a moratorium on construction of new logging roads in remote sections of most of the national forests."

The moratorium will protect millions of acres from new logging, elevating the forests' environmental values -- clean water and wildlife -- above commercial values."

Published by the *NY Times*, January 14, 1998
Link to story: <http://www.nytimes.com/1998/01/14/opinion/a-positive-shift-in-forest-policy.html>

Please do the right thing for future generations. If you wisely apply Firewise the public will learn that fuels reduction logging is not that important. Please eliminate your planned fuels logging that depends on new temporary or system road. This will eliminate the very real natural resource harm caused by road construction discussed above.

The people living in the WUI probably use adjacent national forest land for recreation. They won't want the aquatic resources harmed by sediment and the wildlife habitat fragmented.

Please alert me when the DEIS or pre-decisional EA is posted online and you are accepting comments.

Sincerely,

Dick Artley (retired forest planner, NEPA legal compliance reviewer, forest NEPA coordinator, and forest appeals/litigation coordinator)
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PS: A few of your IDT members know what I have written is true but they are frightened to acknowledge it.

"Never doubt that a small group of thoughtful, committed citizens can change the world. Indeed, it is the only thing that ever has."

Margaret Mead